

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

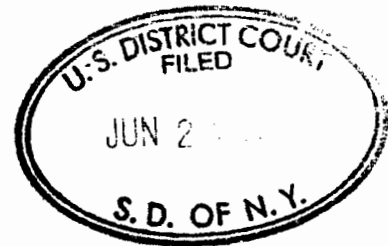
MELVIN ERB, on behalf of himself)
and all others similarly situated,)
)
Plaintiff,)
)
v.)
)
AWB LIMITED and AWB (U.S.A.))
LIMITED)
)
Defendants.)

Civil Action No. 1:07-CV-3880-GEL

**MOTION TO ADMIT COUNSEL
PRO HAC VICE**

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, A. Arnold Gershon, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of

Jeffrey B. Gittleman
Barrack, Rodos & Bacine
3300 Two Commerce Square
2001 Market Street
Philadelphia, PA 19103
Telephone: (215) 963-0600
Facsimile: (215) 963-0838



Jeffrey B. Gittleman is a member in good standing of the Bar of the Commonwealth of Pennsylvania and the State of New Jersey. There are no pending disciplinary proceedings against Jeffrey B. Gittleman in any State or Federal Court.

New York, New York
Dated: June 27, 2007

Respectfully submitted,

A handwritten signature in black ink, appearing to read "A. Arnold Gershon".

A. Arnold Gershon (AG-3809)

BARRACK, RODOS & BACINE
1350 Broadway, Suite 1001
New York, NY 10018
Telephone: (212) 688-0782

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

MELVIN ERB, on behalf of himself)
and all others similarly situated,)
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Plaintiff,)
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v.)
)
AWB LIMITED and AWB (U.S.A.))
LIMITED)
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Defendants.)
_____)

Civil Action No. 1:07-CV-3880-GEL

**AFFIDAVIT OF A. ARNOLD
GERSHON IN SUPPORT OF MOTION
TO ADMIT COUNSEL PRO HAC VICE**

State of New York)
) ss.:
County of New York)

A. Arnold Gershon, being duly sworn, hereby deposes and says as follows:


1. I am a partner at Barrack, Rodos & Bacine, counsel for Plaintiff Melvin Erb in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiff's motion to admit Jeffrey B. Gittleman as counsel pro hac vice to represent Plaintiff in this matter.
2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in 1966. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
3. I have known Jeffrey B. Gittleman since 2006.
4. Jeffrey B. Gittleman is a partner with Barrack, Rodos & Bacine in Philadelphia, Pennsylvania.
5. I have found Jeffrey B. Gittleman to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.
6. Accordingly, I am pleased to move the admission of Jeffrey B. Gittleman, pro hac vice.
7. I respectfully submit a proposed order granting the admission of Jeffrey B. Gittleman, pro hac vice, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit Jeffrey B. Gittleman, pro hac vice, to represent Plaintiff Melvin Erb in the above captioned matter, be granted.

Sworn to before me
this 27 day of June 2007


NOTARY PUBLIC

B. JENNIFER JAFFE
Notary Public, State of New York
No. 0244740001
Qualified in New York County
Commission Expires Aug. 1, 2011 27


A. Arnold Gershon (AG-3809)



Supreme Court of Pennsylvania

CERTIFICATE OF GOOD STANDING

Jeffrey B. Gittleman, Esq.

DATE OF ADMISSION

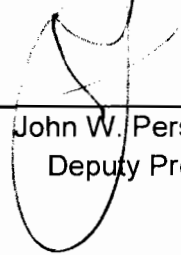
December 2, 1996

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



Witness my Hand and official seal

Dated: June 1, 2007



John W. Person, Jr., Esq.
Deputy Prothonotary

Supreme Court of New Jersey

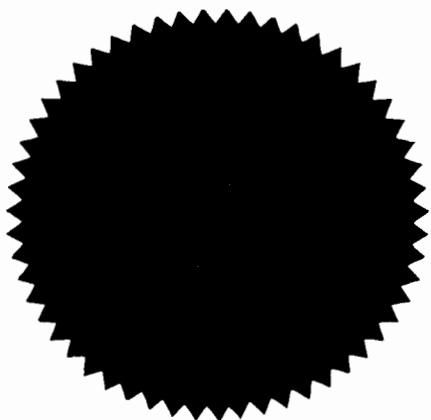


Certificate of Good Standing

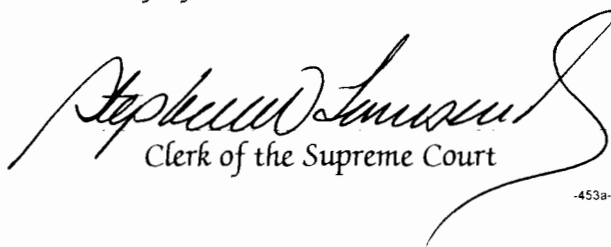
This is to certify that **JEFFREY BRIAN GITTLEMAN**
(No. **031351996**) was constituted and appointed an Attorney at Law of New
Jersey on **December 30, 1996** and, as such,
has been admitted to practice before the Supreme Court and all other courts of this State
as an Attorney at Law, according to its laws, rules, and customs.

I further certify that as of this date, the above-named is an Attorney at Law in
Good Standing. For the purpose of this Certificate, an attorney is in "Good Standing"
if the Court's records reflect that the attorney: 1) is current with all assessments
imposed as a part of the filing of the annual Attorney Registration Statement, including,
but not limited to, all obligations to the New Jersey Lawyers' Fund for Client
Protection; 2) is not suspended or disbarred from the practice of law; 3) has not
resigned from the Bar of this State; and 4) has not been transferred to Disability
Inactive status pursuant to Rule 1:20-12.

*Please note that this Certificate does not constitute confirmation of an attorney's
satisfaction of the administrative requirements of Rule 1:21-1(a) for eligibility to
practice law in this State.*



In testimony whereof, I have
hereunto set my hand and
affixed the Seal of the
Supreme Court, at Trenton, this
31ST day of **May**, 20 **07**


Clerk of the Supreme Court

DECLARATION OF SERVICE

I, ELINOR BERNIER, state as follows:

I am not a party to this action; am over 18 years of age I am a citizen of the United States and a resident in Queens, New York. I have been a legal assistant for over 25 years and am presently employed by Barrack, Rodos & Bacine at 1350 Broadway, New York, New York, attorneys for the plaintiff in the attached action and am familiar with the processing of legal documents for delivery in the ordinary course of business.

I declare that on June 28, 2007 I served the enclosed *Affidavit of A. Arnold Gershon In Support of Motion to Admit Counsel Pro Hac Vice, and [Proposed] Order For Admission Pro Hac Vice on Written Motion* on counsel listed below at the addresses designated by said attorneys for that purpose in the following manner:

- ☒ By depositing a true copy of same enclosed in a properly addressed wrapper, in a depository under the exclusive care and custody for pick up by the United States Postal Service.
- ☐ By hand delivery via messenger service
- ☐ By overnight courier, viz., UPS Express service
- ☐ By facsimile at the FAX numbers listed below (copy of the Confirmation attached).

I further declare under the penalties of perjury under the laws of the State of New York that the foregoing is true and correct.

Dated: New York, New York
June 28, 2007

SEE ATTACHED SERVICE LIST


ELINOR BERNIER

SERVICE LIST (AWB LTD.)

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